

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION

MOUNTAIN VALLEY PIPELINE, LLC,)
)
 Plaintiff,)
)
 v.) Case Number: 7:23CV00809
)
 PHILIP ATETO, ET AL.)
)
 Defendants.)

NOTICE OF CONSTITUTIONAL QUESTION

Pursuant to Fed. R. Civ. P. 5.1, Defendants Philip Ateto, Barkha Bhandari, Joel Davis, Kidus Girma, Klea Hazizaj, Devora Klionsky, Christian Shushok, Sloan Touchet, Brynn West, and Ashley Wagner (“Defendants”) hereby provide notice of the following constitutional question, raised in their Responsive Pleadings to Complaint (Dkt. 48);

Is § 18.2-499 is Unconstitutionally Vague, Both On Its Face and as Applied to Defendants?

The Responsive Pleadings to Complaint and a copy of this Notice have been served on the Attorney General via email to Graham K. Bryant, Deputy Solicitor General of Virginia.

By: /s/ Kira A. Kelley
Kira A. Kelley

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CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2025, I electronically filed the foregoing Notice of Constitutional Question with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel of record.

/s/ Kira A. Kelley
Kira A. Kelley